

No. 16-1313

No. 16-1383

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

UNITED STATES POSTAL SERVICE,
Petitioner,

v.

NATIONAL LABOR RELATIONS BOARD,
Respondent,

and

AMERICAN POSTAL WORKERS UNION, AFL-CIO,
Intervenor

UNOPPOSED MOTION TO EXTEND BRIEFING SCHEDULE

NOW COMES the United States Postal Service (“Postal Service”), Petitioner in the above-captioned case (docketed as case number 16-1313), and moves that the current briefing schedule in these consolidated cases be extended by twenty-one (21) days. In support of this motion, the Postal Service makes the following showing:

1. The Postal Service’s opening brief currently is due Friday, March 24, 2017.

2. The parties to these consolidated cases have agreed to a settlement in principle but need a short extension in order to finalize the details of the settlement in writing.
3. The Postal Service, the National Labor Relations Board, and Intervenor all agree that a twenty-one (21) day extension is warranted and appropriate.

WHEREFORE, the Postal Service respectfully requests that the briefing schedule be extended by twenty-one (21) days, that the date for the Postal Service to file its opening brief be extended to April 14, 2017, and that all other dates be adjusted accordingly.

Respectfully submitted,

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March 21, 2017

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2017, I caused a copy of the foregoing
Unopposed Motion to Extend Briefing Schedule to be filed in the CM/ECF system.
All participants are registered as ECF filers, and will be served by the CM/ECF
system.

/s/Michelle Windmueller
MICHELLE WINDMUELLER

**CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMIT,
TYPEFACE REQUIREMENTS, AND TYPE-STYLE REQUIREMENTS**

In accordance with the requirements of Fed. R. App. P. 32(g)(1), the United States Postal Service hereby submits a certificate of compliance for its Unopposed Motion to Extend Briefing Schedule (“document”).

1. The document complies with the type-volume limit of Fed. R. App. P. 27(d)(1) and (d)(2)(A) because, excluding the parts of the document exempted by Fed. R. App. P. 32(f), the document contains 164 words.
2. The document complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because the document was prepared in a proportionally spaced typeface using Microsoft Word 2013 in Times New Roman 14-point font.

/s/Michelle Windmueller
MICHELLE WINDMUELLER
March 21, 2017